CONSTRUCTION PERMIT -- REVISED

PERMITTEE

American Litho, Inc. Attn: Michael S. Fontana 175 Mercedes Drive Carol Stream, IL 60188

Application No.: 12070056 I.D. No.: 043020ABK

Applicant's Designation: Date Received: October 8, 2014

Subject: Press Replacement Project

Date Issued: November 5, 2014

Location: 175 Mercedes Drive, Carol Stream, DuPage County

This permit is hereby granted to the above-designated Permittee to CONSTRUCT emission unit(s) and/or air pollution control equipment consisting of five (5) heatset web offset lithographic printing lines M110, M1000, S2000A, S2000C, S2000D controlled by an existing regenerative thermal oxidizer, one (1) heatset web offset lithographic printing line S2000B controlled by integrated dryer/oxidizer system, one (1) non-heatset web offset lithographic printing press (Didde), and three (3) sheetfed lithographic printing presses XL105A, XL105B, XL105C pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit is issued based on the emission of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the above-listed equipment being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of the conditions in this permit, the emissions of all HAPs from the above-listed equipment do not trigger the requirements of Section 112(g) of the Clean Air Act.
- b. This permit is issued based on the construction of the six heatset web offset lithographic printing presses, the non-heatset web offset lithographic printing press, and the three sheetfed lithographic printing presses not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the Illinois rules for Major Stationary Sources Construction and Modification, 35 Ill. Adm. Code Part 203. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the emissions of Volatile Organic Material (VOM) from the above-listed equipment below the levels that would trigger the applicability of these rules.

- c. For purposes of this permit, American Litho, Inc. is considered a single source with American Litho, Inc. I.D. No. 043020ACB, located at 160 East Elk Trail, Carol Stream. The source has elected to obtain separate permits for these locations.
- d. The operation of the equipment listed above is allowed under this construction permit for a period of one year from the date of issuance of this revised construction permit.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- 3. Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- 4a. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall apply only to photochemical reactive material.
- b. Pursuant to 35 Ill. Adm. Code 218.407(a), no owner or operator of lithographic printing lines subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart H shall:

- i. Cause or allow the operation of any heatset web offset lithographic printing line unless:
 - A. The total VOM content in the as-applied fountain solution shall not exceed:
 - I. 1.6 percent, by weight.
 - II. 3 percent or less, by weight, and the temperature of the fountain solution is maintained below $15.6\,^{\circ}\text{C}$ (60°F), measured at the reservoir or the fountain tray; or
 - III. 5 percent or less, by weight, and the as-applied fountain solution contains no alcohol.
 - B. The air pressure in the dryer is maintained lower than the air pressure of the press room, such that air flow through all openings in the dryer, other than the exhaust, is into the dryer at all times when the printing line is operating;
 - C. An afterburner is installed and operated so that VOM emissions (excluding methane and ethane) from the press dryer exhausts are reduced on and after August 1, 2010, by 90 percent, by weight, for afterburners first constructed at the source prior to January 1, 2010; by at least 95 percent, by weight, for afterburners first constructed at the source on or after January 1, 2010; or to a maximum afterburner exhaust outlet concentration of 20 ppmv (as carbon);
 - D. The afterburner complies with all monitoring provisions specified in 35 Ill. Adm. Code 218.410(c); and
 - E. The afterburner is operated at all times when the printing line is in operation, except the afterburner may be shut down between November 1 and April 1 as provided in 35 Ill. Adm. Code 218.107.
- ii. Cause or allow the operation of any non-heatset web offset lithographic printing line unless the VOM content of the asapplied fountain solution is 5 percent or less, by weight, and the as-applied fountain solution contains no alcohol;
- iii. Cause or allow the operation of any sheet-fed offset lithographic printing line unless:
 - A. The VOM content of the as-applied fountain solution is 5 percent or less, by weight; or
 - B. The VOM content of the as-applied fountain solution is 8.5 percent or less, by weight, and the temperature of the

fountain solution is maintained below 15.6°C (60°F), measured at the reservoir or the fountain tray;

- iv. Cause or allow the use of a cleaning solution on any lithographic printing line unless:
 - A. The VOM content of the as-used cleaning solution is less than or equal to:
 - I. 30 percent, by weight; or
 - II. On and after August 1, 2010, for owners or operators of sources that meet the applicability criteria in 35 Ill. Adm. Code 218.405(c) (3) and do not certify pursuant to 35 Ill. Adm. Code 218.411(g) (1) (B) that the source will not make use of any of the exclusions in 35 Ill. Adm. Code 218.405(c) (3), 70 percent, by weight; or
 - B. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F).
- v. Cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers, except when specifically in use.
- 5. This permit is issued based on the six heatset web offset lithographic printing presses, the non-heatset web offset lithographic printing press, and the three sheetfed lithographic printing presses not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ. Pursuant to 40 CFR 63.3300(c), web coating lines in lithography, screen-printing, letterpress, and narrow-web flexographic printing processes are not part of the affected source under 40 CFR 63 Subpart JJJJ.
- 6a. This permit is issued based on the source not being subject to 35 Ill. Adm. Code 218.187 (Other Industrial Solvent Cleaning Operations). Pursuant to 35 Ill. Adm. Code 218.187(a) (2), notwithstanding 35 Ill. Adm. Code 218.187(a) (1):
 - i. The following cleaning operations shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g);
 - A. Janitorial cleaning;
 - B. Stripping of cured coatings, inks, or adhesives, including screen reclamation activities;

- C. Cleaning operations in printing pre-press areas, including the cleaning of film processors, color scanners, plate processors, film cleaning, and plate cleaning;
- ii. Cleaning operations for emission units within the following source categories shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g);
 - A. Lithographic printing;
 - B. Paper, film and foil coating;
- iii. The following cleaning operations shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (f), and (q):
 - A. Cleaning of metering rollers, dampening rollers, and printing plates;
 - B. Cleaning operations associated with digital printing.
- b. Pursuant to 35 Ill. Adm. Code 218.405(c), on and after August 1, 2010:
 - i. The requirements in 35 Ill. Adm. Code 218.407(a)(1)(B) through (a)(1)(E) and 218.407(b) and all applicable provisions in 35 Ill. Adm. Code 218.409 through 218.411 shall apply to all owners or operators of heatset web offset lithographic printing lines, if the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) ever exceed 45.5 kg/day (100 lbs/day) calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B), before the application of capture systems and control devices;
 - ii. The requirements in 35 Ill. Adm. Code 218.407(a)(1)(A) and (a)(2) through (a)(5) and all applicable provisions in 35 Ill. Adm. Code 218.409 through 218.411 shall apply to all owners or operators of lithographic printing lines if the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) ever equal or exceed 6.8 kg/day (15 lbs/day), calculated in accordance with 35 Ill. Adm. Code 218.411(b)(1)(B), before the application of capture systems and control devices;
 - iii. Notwithstanding 35 Ill. Adm. Code 218.405(c)(2), at sources where the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) equal or exceed 6.8 kg/day (15 lbs/day) but do not exceed 45.5 kg/day (100 lbs/day), calculated in accordance with 35 Ill. Adm. Code 218.411(b)(1)(B), before the application of capture systems and control devices, the following exclusions shall apply unless the owner or operator of the source certifies pursuant to 35 Ill.

Adm. Code 218.411(g)(1)(B) that the source will not make use of any such exclusions:

- A. The requirements of 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), and (a)(3) shall not apply to lithographic printing lines with a total fountain solution reservoir of less than 3.8 liters (1 gallon);
- B. The requirements of 35 Ill. Adm. Code 218.407(a)(3) shall not apply to sheet-fed offset lithographic printing lines with maximum sheet size of 11x17 inches or smaller;
- C. The requirements of 35 Ill. Adm. Code 218.407(a)(4) shall not apply to up to a total of 416.3 liters (110 gallons) per year of cleaning materials used on all lithographic printing lines at the source;
- D. The requirements of 35 Ill. Adm. Code 218.407(a)(4)(A)(i) shall not apply to lithographic printing lines at the source. Instead, the requirements of 35 Ill. Adm. Code 218.407(a)(4)(A)(ii) shall apply to such lines.
- 7a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
 - b. The regenerative thermal oxidizer combustion chamber and integrated dryer/oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than 90% of the average temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test, before the printing process is begun, and this temperature shall be maintained during operation of the affected printing lines.
- c. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the regenerative thermal oxidizer and the integrated dryer/oxidizer system such that the regenerative thermal oxidizer and the dryer/integrated oxidizer system are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- d. The press dryers, the regenerative thermal oxidizer and the integrated oxidizer system associated with the six heatset web offset litho printing presses shall only be operated with natural gas as the fuel. The use of any other fuel in the press dryers, regenerative thermal oxidizer or the integrated oxidizer system requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.

8a. Emissions of volatile organic material (VOM) from printing lines M110, M1000, S2000A, S2000B, S2000C, S2000D, Didde, XL105A, XL105B and XL105C shall not exceed the following limits:

VOM Emissions

(Tons/Month)
8.17

(Tons/Year) 65.43

These limits are based on the maximum material usage, the maximum VOM contents, 20% by weight ink solvent retention in the web, regenerative thermal oxidizer control and VOM and HAP emissions from the heatset web offset printing lines shall be calculated based on the following:

i. Ink and varnishes VOM and HAP Emissions (E_i) :

$$E_i = C_i * (1 - R_i/100) * (1 - [(K/100) * (J_i/100)])$$

ii. Fountain Solution and glue VOM or HAP Emissions (E_f) :

$$E_f = C_f * (1 - [(K/100) * (J_f/100)])$$

iii. Manual Cleaning Solvent VOM or HAP Emissions (E_m) :

$$E_m = C_m * (1 - R_m/100)$$

iv. Automatic Cleaning Solvent VOM or HAP Emissions (E_a) :

$$E_a = C_a * (1 - [(K/100) * (J_a/100)])$$

v. Other VOM or HAP Emissions (E,):

$$E_{11} = C_{11}$$

vi. Total VOM or HAP Emissions (E_t) :

$$E_t = E_i + E_f + E_m + E_a + E_u$$

Where:

 C_i = Ink and varnish VOM or HAP consumption (where consumption is the usage * the VOM or HAP content);

 C_f = Fountain solution and glue VOM or HAP consumption;

 $C_m = Manual cleaning solvent VOM or HAP consumption;$

C_a = Automatic cleaning solvent VOM or HAP consumption;

 $C_u = Other coating solvent VOM or HAP consumption;$

 R_i = Percent of ink VOM or HAP retained in printed product = 20, for heatset in, =95 for coldest ink.;

- R_{m} = Percent of manual cleaning solvent VOM or HAP retained in cleaning wipes = 50 (used wipes shall be stored in closed containers);
- R_u = Percent of UV coating VOM or HAP retained in printed product = 20;
- K = Control efficiency of thermal oxidizer =0 if not controlled;
- $J_{\rm i}$ = Capture efficiency of dryer and control system for ink VOM or HAP = 100;
- J_f = Capture efficiency of dryer and control system for fountain solution VOM or HAP = 70;
- $J_a=$ Capture efficiency of dryer and control system for automatic cleaning solvent VOM or HAP = 40, 0 if not controlled;
- b. Operation of and emissions from the combustion of natural gas in the press dryers, regenerative thermal oxidizer and the integrated dryer/ oxidizer system shall not exceed the following limits:
 - i. Natural Gas Usage: 31.2 mmscf/month and 250 mmscf/year
 - ii. Emissions from the combustion of natural gas:

	Emission Factor	Emissions	
Pollutant	(lbs/mmscf)	(Tons/Mo)	(Tons/Yr)
Carbon Monoxide (CO)	84	1.31	10.50
Nitrogen Oxides (NO_x)	100	1.56	12.50
Particulate Matter (PM)	7.6	0.12	0.95
Sulfur Dioxide (SO ₂)	0.6	0.01	0.08
Volatile Organic Material (VOM)	5.5	0.09	0.69

These limits are based on the maximum fuel usage and standard emission factors (Tables 1.4-1 and1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from printing lines M110, M1000, S2000A, S2000B, S2000C, S2000D, Didde, XL105A, XL105B and XL105C shall not exceed 0.79 tons/month and 7.90 tons/year of any single HAP and 1.99 tons/month and 19.90 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from the above listed equipment not triggering the requirements of Section 112(g) of the Clean Air Act.

- d. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 9a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source of air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
 - b. Testing required by Conditions 10 and 11 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 10. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 11a. Pursuant to 35 Ill. Adm. Code 218.409(a), testing to demonstrate compliance with requirements of 35 Ill. Adm. Code 218.407 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA, or as otherwise specified in 35 Ill. Adm. Code 218

- Subpart H. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting such testing to allow the Illinois EPA to be present during such testing.
- b. Pursuant to 35 Ill. Adm. Code 218.409(b), the methods and procedures of 35 Ill. Adm. Code 218.105(d) and (f) shall be used for testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1), as follows:
 - i. To select the sampling sites, Method 1 or 1A, as appropriate, 40 CFR 60, Appendix A. The sampling sites for determining efficiency in reducing VOM from the dryer exhaust shall be located between the dryer exhaust and the control device inlet, and between the outlet of the control device and the exhaust to the atmosphere;
 - ii. To determine the volumetric flow rate of the exhaust stream, Method 2, 2A, 2C, or 2D, as appropriate, 40 CFR 60, Appendix A;
 - iii. To determine the VOM concentration of the exhaust stream entering and exiting the control device, Method 25 or 25A, as appropriate, 40 CFR 60, Appendix A. For thermal and catalytic afterburners, Method 25 must be used except under the following circumstances, in which case Method 25A must be used:
 - A. The allowable outlet concentration of VOM from the control device is less than 50 ppmv, as carbon;
 - B. The VOM concentration at the inlet of the control device and the required level of control result in exhaust concentrations of VOM of 50 ppmv, or less, as carbon; and
 - Due to the high efficiency of the control device, the С. anticipated VOM concentration at the control device exhaust is 50 ppmv or less, as carbon, regardless of inlet concentration. If the source elects to use Method 25A under this option, the exhaust VOM concentration must be 50 ppmv or less, as carbon, and the required destruction efficiency must be met for the source to have demonstrated compliance. If the Method 25A test results show that the required destruction efficiency apparently has been met, but the exhaust concentration is above 50 ppmv, as carbon, a retest is required. The retest shall be conducted using either Method 25 or Method 25A. If the retest is conducted using Method 25A and the test results again show that the required destruction efficiency apparently has been met, but the exhaust concentration is above 50 ppmv, as carbon, the source must retest using Method 25;
 - iv. Notwithstanding the criteria or requirements in Method 25 which specifies a minimum probe temperature of 129° C $(265^{\circ}F)$, the probe

- must be heated to at least the gas stream temperature of the dryer exhaust, typically close to 176.7° C (350° F);
- v. During testing, the printing line(s) shall be operated at representative operating conditions and flow rates; and
- vi. During testing, an air flow direction indicating device, such as a smoke stick, shall be used to demonstrate 100 percent emissions capture efficiency for the dryer in accordance with 35 Ill. Adm. Code 218.407(a)(1)(B).
- c. Pursuant to 35 Ill. Adm. Code 218.409(c), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), (a)(3) and (a)(4)(A), and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of 35 Ill. Adm. Code 218.411(a)(1)(B), (b)(1)(B), or (b)(2)(B), as applicable), shall be conducted upon request of the Illinois EPA or as otherwise specified in 35 Ill. Adm. Code 218 Subpart H, as follows:
 - i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) shall be used; provided, however, Method 24, shall be used to demonstrate compliance; or
 - ii. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a); provided, however, Method 24 shall be used to determine compliance.
- d. Pursuant to 35 Ill. Adm. Code 218.409(e), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. 218.110.
- 12a. Within 60 days after achieving the maximum production rate at which the five (5) heatset web offset lithographic printing lines M110, M1000, S2000A, S2000C, S2000D to be controlled by existing regenerative thermal oxidizer will be operated, but not later than 180 days after initial startup, a stack test shall be conducted during conditions which are representative of maximum emissions. During the stack test the control efficiency of the RTO associated with the five (5) heatset web offset lithographic printing lines shall be measured by an approved testing service.
 - b. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the Illinois EPA: Refer to 40 CFR 60, Appendix A, and 40 CFR 61, Appendix B, for USEPA test methods:

Sample and Velocity Traverses for Stationary Sources	USEPA	Method	1
Sample and Velocity Traverses for Stationary Sources with Small Stacks or Ducts	USEPA	Method	1A
Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot Tube)	USEPA	Method	2
Direct measurement of gas volume through pipes and small ducts	USEPA	Method	2A
Determination of Gas Velocity and Volumetric Flow Rate in Small Stacks or Ducts (Standard Pitot Tube)	USEPA	Method	2C
Measurement of Gas Volume Flow Rates in Small Pipes and Ducts	USEPA	Method	2D
Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings	USEPA	Method	24
Determination of Total Gaseous Nonmethane Organic Emissions as Carbon	USEPA	Method	25
Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer	USEPA	Method	25A*

USEPA Method 25A may only be used if outlet VOM concentration is less than $50~\rm{ppm}$ as carbon (non-methane).

- c. At least 30 days prior to the actual date of testing, the Permittee shall submit a written test plan to the Illinois EPA, Compliance Section. This plan shall include at a minimum:
 - i. The name (or other identification of the emission units to be tested and the name and address of the facility at which they are located;
 - ii. The name and address of the independent testing service(s) who will be performing the tests, with the names of the individuals who may be performing sampling and analysis and their experience with similar tests;
 - iii. The specific determinations of emissions and/or performance which are intended to be made, including the site(s) in the ductwork or stacks at which sampling will occur;
 - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions, minimum control performance, the levels of operating parameters for the emission units, including associated control equipment, at or within which compliance is intended to be shown, and the means by which the operating parameters will be determined;
 - v. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods. The specific sampling, analytical and quality control

- procedures which will be used, with an identification of the standard methods upon which they are based;
- vi. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justifications;
- vii. Any proposed use of an alternative test method, with detailed justification; and
- viii. The format and content of the Source Test Report.
- d. The Permittee shall provide the Illinois EPA with written notification of testing at least thirty (30) days prior to testing to enable the Illinois EPA to have an observer present. This notification shall include the name of emission unit(s) to be tested, scheduled date and time, and contact person with telephone number.
- e. If testing is delayed, the Permittee shall promptly notify the Illinois EPA by facsimile, at least 5 days prior to the scheduled date of testing or immediately, if the delay occurs in the 5 days prior to the scheduled date. This notification shall also include the new date and time for testing, if set, or a separate notification shall be sent with this information when it is set.
- f. The Permittee shall submit the Final Test Report(s) for these tests accompanied by a cover letter stating whether or not compliance was shown, to the Illinois EPA without delay, within 30 days after the test results are compiled, but no later than 60 days after the date of testing or sampling. The Final Report shall include at a minimum:
 - i. General information describing the test, including the name and identification of the emission source which was tested, date of testing, names of personnel performing the tests, and Illinois EPA observers, if any;
 - ii. A summary of results;
 - iii. Description of test procedures and method(s), including description and map of emission units and of sampling points, sampling train, testing and analysis equipment, and test schedule;
 - iv. Detailed description of test conditions, including:
 - A. List and description of the equipment (including serial numbers or other equipment specific identifiers) tested and process information (i.e., mode(s) of operation, process rate, fuel or raw material consumption rate, and heat content of the fuels);
 - B. Control equipment information (i.e., equipment condition and operating parameters) during testing; and

- C. A discussion of any preparatory actions taken (i.e., inspections, maintenance and repair).
- v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration. Identification of the applicable regulatory standards that the testing was performed to demonstrate compliance with, a comparison of the test results to the applicable regulatory standards, and a statement whether the test(s) demonstrated compliance with the applicable standards;
- vi. An explanation of any discrepancies among individual tests, failed tests or anomalous data.
- vii. The results and discussion of all quality control evaluation data, including a copy of all quality control data; and
- viii. The applicable operating parameters of the pollution control device(s) during testing (temperature, pressure drop, scrubbant flow rate, etc.), if any.
- g. Satisfactory completion of this test so as to demonstrate compliance with applicable emission standards is a prerequisite to issuance of an operating permit, pursuant to 35 Ill. Adm. Code 201.160(a), (b) and (c).
- 13a. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(A)(i), an owner or operator that uses an afterburner or carbon adsorber to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use except as provided in 35 Ill. Adm. Code 218.105(d)(3). The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.
 - b. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(B), an owner or operator that uses an afterburner to comply with any Section of 35 Ill. Adm. Code Part 218 must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of \pm 1 percent of the temperature measured in degrees Celsius or \pm 0.5° C, whichever is greater.
 - c. Pursuant to 35 Ill. Adm. Code 218.410(a), Fountain Solution Temperature:
 - i. The owner or operator of any lithographic printing lines relying on the temperature of the fountain solution to demonstrate compliance shall install, maintain, and continuously operate a

- temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable.
- ii. The temperature monitor must be capable of reading with an accuracy of 1°C or 2°C, and must be attached to an automatic, continuous recording device such as a strip chart, recorder, or computer, with at least the same accuracy, that is installed, calibrated and maintained in accordance with the manufacturer's specifications. If the automatic, continuous recording device malfunctions, the owner or operator shall record the temperature of the fountain solution at least once every two operating hours. The automatic, continuous recording device shall be repaired or replaced as soon as practicable.
- d. Pursuant to 35 Ill. Adm. Code 218.410(b), the owner or operator of any lithographic printing line(s) subject to 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2) or (a)(3) shall:
 - i. For a fountain solution to which VOM is not added automatically:
 - A. Maintain records of the VOM content of the fountain solution in accordance with 35 Ill. Adm. Code 218.411(c)(2)(C); or
 - Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and shall determine compliance with the VOM content limitation of the asapplied fountain solution by using one of the following options:
 - I. With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer; or
 - II. With a conductivity meter if it is demonstrated that a refractometer and hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly

different measurements for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be referenced to the conductivity of the incoming water. A standard solution shall be used to calibrate the conductivity meter for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications;

- ii. For fountain solutions to which VOM is added at the source with automatic feed equipment, determine the VOM content of the asapplied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level. Records must be retained of the VOM content of the fountain solution in accordance with 35 Ill. Adm. Code 218.411(e)(2)(D). The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications.
- e. Pursuant to 35 Ill. Adm. Code 218.410(c), if an afterburner is used to demonstrate compliance, the owner or operator of a heatset web offset lithographic printing line subject to 35 Ill. Adm. Code 218.407(a)(1)(C) shall:
 - i. Install, calibrate, maintain, and operate temperature monitoring device(s) with an accuracy of 3°C or 5°F on the afterburner in accordance with 35 Ill. Adm. Code 218.105(d)(2) and in accordance with the manufacturer's specifications. Monitoring shall be performed at all times when the afterburner is operating; and
 - ii. Install, calibrate, operate and maintain, in accordance with the manufacturer's specifications, a continuous recorder on the temperature monitoring device(s), such as a strip chart, recorder or computer, with at least the same accuracy as the temperature monitor.
- f. Pursuant to 35 Ill. Adm. Code 218.410(e), Cleaning Solution:
 - i. The owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with 35 Ill. Adm. Code 218.407(a)(4)(A) must:
 - A. For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):
 - Install, operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed; and

- II. Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with 35 Ill. Adm. Code 218.407(a)(4)(A).
- B. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) as set forth in 35 Ill. Adm. Code 218.411(f)(2).
- ii. The owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 Ill. Adm. Code 218.407(a)(4)(B) must keep records for such cleaning solutions used on any such lines as set forth in 35 Ill. Adm. Code 218.411(f)(2)(C).
- 14. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under $40~\mathrm{CFR}$ 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- 15. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.

- 16a. Pursuant to 35 Ill. Adm. Code 218.411(c), unless complying with 35 Ill. Adm. Code 218.411(b)(1)(C) and (b)(1)(F), an owner or operator of lithographic printing lines subject to the requirements of 35 Ill. Adm. Code 218.411(a) or (b) shall collect and record either the information specified in 35 Ill. Adm. Code 218.411(c)(1) or (c)(2) for all lithographic printing lines at the source:
 - i. Standard recordkeeping, including the following:
 - A. The name and identification of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line recorded each month;
 - B. A daily records which shows whether a lithographic printing line at the source was in operation on that day;
 - C. The VOM content and the volume of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;
 - D. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month;
 - E. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B), (b)(1)(B), or (b)(2)(B), as applicable;
 - ii. Purchase and inventory recordkeeping, including the following:
 - A. The name, identification, and VOM content of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;
 - B. Inventory records from the beginning and end of each month indicating the total volume of each fountain solution additive, lithographic ink, and cleaning solvent to be used on any lithographic printing line at the source;
 - C. Monthly purchase records for each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line at the source;
 - D. A daily record which shows whether a lithographic printing line at the source was in operation on that day;

- E. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month based on the monthly inventory and purchase records required to be maintained pursuant to 35 Ill. Adm. Code 218.411(c)(2)(A), (c)(2)(B), and (c)(2)(C);
- F. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B), (b)(1)(B), or (b)(2)(B), as applicable.
- b. Pursuant to 35 Ill. Adm. Code 218.411(d)(3), an owner or operator of a heatset web offset lithographic printing line(s) subject to the control requirements of 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1) shall, except as provided in 35 Ill. Adm. Code 218.411(d)(3)(D)(ii), collect and record daily the following information for each heatset web offset lithographic printing line subject to the requirements of 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1):
 - i. Afterburner or other approved control device monitoring data in accordance with 35 Ill. Adm. Code 218.410(c) or (d), as applicable;
 - ii. A log of operating time for the afterburner or other approved control device, monitoring equipment, and the associated printing line;
 - iii. A maintenance log for the afterburner or other approved control device and monitoring equipment detailing all routine and nonroutine maintenance performed, including dates and duration of any outages; and
 - iv. A log detailing checks on the air flow direction or air pressure of the dryer and press room to insure compliance with the requirements of 35 Ill. Adm. Code 218.407(a)(1)(B) on and after August 1, 2010, at least once per calendar month while the line is operating.
- c. Pursuant to 35 Ill. Adm. Code 218.411(e)(2), an owner or operator of a lithographic printing line subject to 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), or (a)(3), shall collect and record the following information for each fountain solution:
 - i. The name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines, the lithographic printing line(s) or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch;

- ii. If an owner or operator uses a hydrometer, refractometer, or conductivity meter, pursuant to 35 Ill. Adm. Code 218.410(b)(1)(B), to demonstrate compliance with the applicable VOM content limit in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), or (a)(3):
 - A. The date and time of preparation and each subsequent modification of the batch;
 - B. The results of each measurement taken in accordance with 35 Ill. Adm. Code 218.410(b);
 - C. Documentation of the periodic calibration of the meter in accordance with the manufacturer's specifications, including date and time of calibration, personnel conducting, identity of standard solution, and resultant reading; and
 - D. Documentation of the periodic temperature adjustment of the meter, including date and time of adjustment, personnel conducting and results;
- iii. If the VOM content of the fountain solution is determined pursuant to 35 Ill. Adm. Code 218.410(b)(1)(A), for each batch of as-applied fountain solution:
 - A. Date and time of preparation and each subsequent modification of the batch;
 - B. Volume or weight, as applicable, and VOM content of each component used in, or subsequently added to, the fountain solution batch;
 - C. Calculated VOM content of the as-applied fountain solution; and
 - D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2) and (a)(3);
- iv. If the VOM content of the fountain solution is determined pursuant to 35 Ill. Adm. Code 218.410(b)(2), for each setting:
 - A. VOM content limits corresponding to each setting;
 - B. Date and time of initial setting and each subsequent setting;
 - C. Documentation of the periodic calibration of the automatic feed equipment in accordance with the manufacturer's specifications; and

- D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2) and (a)(3).
- v. If the owner or operator relies on the temperature of the fountain solution to comply with the requirements in 35 Ill. Adm. Code 218.407(a)(1)(A)(ii) or (a)(3)(B):
 - A. The temperature of the fountain solution at each printing line, as monitored in accordance with 35 Ill. Adm. Code 218.410(a); and
 - B. A maintenance log for the temperature monitoring devices and automatic, continuous temperature recorders detailing all routine and non-routine maintenance performed, including dates and duration of any outages.
- d. Pursuant to 35 Ill. Adm. Code 218.411(f)(2), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of 35 Ill. Adm. Code 218.407 shall collect and record the following information for each cleaning solution used on each lithographic printing line:
 - i. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 Ill. Adm. Code 218.407(a)(4)(A) and which is prepared at the source with automatic equipment:
 - A. The name and identification of each cleaning solution;
 - B. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(c);
 - C. Each change to setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
 - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
 - E. The VOM content of the as-used cleaning solution, with supporting calculations; and
 - F. A calibration log for the automatic equipment, detailing periodic checks.
 - ii. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with

- 35 Ill. Adm. Code 218.407(a)(4)(A), and which is not prepared at the source with automatic equipment:
- A. The name and identification of each cleaning solution;
- B. Date and time of preparation, and each subsequent modification, of the batch;
- C. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(c);
- D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
- E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a);
- iii. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with 35 Ill. Adm. Code 218.407(a)(4)(B):
 - A. The name and identification of each cleaning solution;
 - B. Date and time of preparation, and each subsequent modification, of the batch;
 - C. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with 35 Ill. Adm. Code 218.409(e). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a) and 218.110;
 - D. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
 - E. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(e). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests

conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a) and 218.110;

- iv. The date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any.
- e. Pursuant to 35 Ill. Adm. Code 218.411(g)(2)(A), the owner or operator of lithographic printing lines subject to one or more of the exclusions set forth in 35 Ill. Adm. Code 218.405(c)(3) shall, unless the source has certified in accordance with 35 Ill. Adm. Code 218.411(g)(1)(B) that it will not make use of any of the exclusions set forth in 35 Ill. Adm. Code 218.405(c)(3), collect and record the following information for all lithographic printing lines at the source:
 - i. Calculations that demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source never exceed 45.5 kg/day (100 lbs/day) before the use of capture systems and control devices, determined in accordance with the calculations in 35 Ill. Adm. Code 218.411(b)(2)(B);
 - ii. The name, identification, and volume of all cleaning materials used per calendar month on lithographic printing lines at the source that do not comply with the cleaning material limitations in 35 Ill. Adm. Code 218.407(a)(4);
- f. Pursuant to 35 Ill. Adm. Code 218.411(h), the owner or operator shall maintain all records required by 35 Ill. Adm. Code 218.411 at the source for a minimum period of three years and shall make all records available to the Illinois EPA upon request.
- 17a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Records addressing use of good operating practices for the regenerative thermal oxidizer and the integrated dryer/oxidizer system:
 - A. Records for periodic inspection of the regenerative thermal oxidizer and the integrated dryer/oxidizer system with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

- ii. VOM contents of inks, cleaning solutions, coatings and other VOM containing materials (% by weight);
- iii. Monthly and annual usages of inks, cleaning solutions, fountain solutions and other VOM containing materials (lbs/month and tons/year);
- iv. HAP content of the materials used (% by weight);
- v. Natural gas usage for the press dryers, the regenerative thermal oxidizer and the integrated dryer/oxidizer system associated with the six heatset web offset lithographic printing presses (mmscf/month and mmscf/year); and
- vi. Monthly and annual emissions of CO, NO_x , PM, SO_2 , VOM, and HAPs from the six heatset web offset lithographic printing presses, the non-heatset web offset lithographic printing press, and the three sheetfed lithographic printing presses with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 18. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 19a. Pursuant to 35 Ill. Adm. Code 218.411(d), an owner or operator of a heatset web offset lithographic printing line subject to the control requirements of 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1) shall comply with the following:
 - i. If testing of the afterburner or other approved control device is conducted pursuant to 35 Ill. Adm. Code 218.409(b), the owner or operator shall, within 90 days after conducting such testing, submit a copy of all test results to the Illinois EPA and shall submit a certification to the Illinois EPA that includes the following:
 - A. A declaration that all tests and calculations necessary to demonstrate whether the lithographic printing line(s) is in

- compliance with 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1), as applicable, have been properly performed;
- B. A statement whether the lithographic printing line(s) is or is not in compliance with 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1), as applicable; and
- C. The operating parameters of the afterburner or other approved control device during testing, as monitored in accordance with 35 Ill. Adm. Code 218.410(c) or (d), as applicable.
- ii. Notify the Illinois EPA in writing of any violation of 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1) within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation;
- iii. If changing its method of compliance between 35 Ill. Adm. Code 218.411(a)(1)(C) and (b), certify compliance for such new method of compliance in accordance with 35 Ill. Adm. Code 218.411(d)(1), at least 30 days before making such change, and perform all tests and calculations necessary to demonstrate that such printing lines will be in compliance with the requirements of 35 Ill. Adm. Code 218.407(a)(1)(B), (a)(1)(C), (a)(1)(D) and (a)(1)(E), or 35 Ill. Adm. Code 218.407(b), as applicable.
- b. Pursuant to 35 Ill. Adm. Code 218.411(e)(3), an owner or operator of a lithographic printing line subject to of 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), or (a)(3), shall notify the Illinois EPA in writing of any violation of 35 Ill. Adm. Code 218.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation.
- c. Pursuant to 35 Ill. Adm. Code 218.411(f)(3), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of 35 Ill. Adm. Code 218.407 shall notify the Illinois EPA in writing of any violation of 35 Ill. Adm. Code 218.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation.
- d. Pursuant to 35 Ill. Adm. Code 218.411(g), the owner or operator of lithographic printing lines subject to one or more of the exclusions set forth in 35 Ill. Adm. Code 218.405(c)(3) shall:
 - i. If changing from utilization of the exclusions set forth in 35 Ill. Adm. Code 218.405(c)(3) to opting out of such exclusions pursuant to 35 Ill. Adm. Code 218.411(g)(1)(B), or if there is a change at the source such that the exclusions no longer apply, certify compliance in accordance with 35 Ill. Adm. Code 218.411(g)(1)(B), within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that

such printing line(s) will be in compliance with the applicable requirements of 35 Ill. Adm. Code 218.407;

- ii. If changing from opting out of the exclusions set forth in 35 Ill. Adm. Code 218.405(c)(3) pursuant to 35 Ill. Adm. Code 218.411(g)(1)(B) to utilization of such exclusions, certify compliance in accordance with 35 Ill. Adm. Code 218.411(g)(1)(A) within 30 days after making such change.
- 20a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
 - b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency Division of Air Pollution Control Compliance Section (#40) P.O. Box 19276 Springfield, Illinois 62794-9276

<u>and</u> one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency Division of Air Pollution Control 9511 West Harrison Des Plaines, Illinois 60016

It should be noted this construction permit has been revised to extend the construction permit for one additional year.

If you have any questions on this, please call David Hulskotter at 217/785-1705.

Raymond E. Pilapil	Date Signed:
Acting Manager, Permit Section	
Division of Air Pollution Control	

REP:DWH:jws

cc: Illinois EPA, FOS Region 1 Lotus Notes